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April 15, 2009

Chris Hoidal, Director Western Region Pipeline Hazardous Materials Safety Administration 12300 West Dakota Ave, Suite 110 Lakewood, CO 80228

RE: CPF No. 5-2009-5014M

Dear Mr. Hoidal,

This letter is in response to your letter dated March 17, 2009 regarding the Notice of Amendment (NOA), received by ConocoPhillips Pipe Line Company (CPPL) on March 23, 2009. CPPL does not wish to contest the NOA at this time.

By submitting this response, CPPL does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

Item.1 §195.452 Pipeline integrity management in high consequence areas.

- (h) What actions must an operator take to address integrity issues?
- (3) Schedule for evaluation and remediation. An operator must complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation. If an operator cannot meet the schedule for any condition, the operator must explain the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection.

PHMSA's Position

CPPL's procedure does not ensure that in the event an anomaly condition is not repaired according to the schedule for the condition, and the operator is unable to reduce pressure, that the operator explains the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection. CPPL procedures are not in compliance with § 195.452 (h)(3).

CPPL's Response

Although historically PHMSA IMP Notifications have been made in a timely manner, CPPL recognizes the need to enhance the process identified in our Integrity Management Program (IMP) to ensure that submittal of future PHMSA Notifications for applicable derations are not missed. In order to close this gap CPPL will implement the following steps:

1) The following steps have been added to CPPL's IMP Appendix 05M, "ILI Assessment Procedure" to ensure that the proper notifications are made and validated in the future.

IMP Appendix 05M ILI Assessment Procedure:

If the line cannot be derated, is not able to operate under a pressure deration, or the necessary deration is outside of the requirements of 195.452, a Notification to PHMSA must be made per MPR-4103 and further controls must be implemented to ensure public safety and environmental protection. The Integrity Engineer (IE) will email (an automatic reminder has been added to ensure that a required response is sent to the initiator within 24 hours of the email) Director of Pipeline Integrity, Manager of Asset Integrity, and Manager of Regulatory Compliance of the PHMSA notification requirement. The Director of Asset Integrity must submit a notification to PHMSA based upon information gathered in the following step.

- Complete the required information for the PHMSA notification form. An editable copy of the form is located at: (link to PHMSA Notification Form).
- Upon submission of the information to the PHMSA website, post a copy of the submission to EDMS under the appropriate line ID.
- Upon notification of status from PHMSA, post a copy to EDMS under the appropriate line ID.
- 2) A formal communication log to track complex deration and Notification Status will be developed to eliminate the confusion of e-mail chains by April 30, 2009.

CPPL MPR 4103 General Line and Equipment Maintenance-Derating a Pipeline to a Lower Operating Pressure: This is currently a text document outlining the process to establish pipeline derations for various anomalous conditions and operating scenarios. The document will be augmented with checklists and/or flow charts to facilitate the decision making process for IMP related pipeline derations to be completed by June 30, 2009.

The inadequacies as identified in this Notice of Amendment have been addressed in the attached revised Procedure. CPPL requests that this enforcement action be closed and for PHMSA to provide notice that this enforcement action has been closed.

Should you or anyone in your staff have any questions please call or e-mail me.

Sincerely,

Todd Tullio

Manager, Regulatory Compliance

CC. Mike Miller CPPL Mark Drumm CPPL

Van Williams CPPL



IMP Appendix 05M ILI Assessment Procedure

For

Anomaly Assessments and Selection
Using

ILI Smart Tool's Pipeline Inspection Preliminary and Final Reports

An Integrity Engineer's Procedure

Rev. 42 - Effective Date: 2009-04-15

Developed for

ConocoPhillips Pipe Line Company

Document Owner: Matthew Nimmo

Rev. 42 - Effective Date: 2009-04-15

Upon Receipt of Preliminary ILI Vendor Reports

P1)Copy (or save email as an Outlook Message Format), the Vendor information received to the S:\ drive folders including the dig sheets, where applicable.

P2)Update BAP Database with preliminary report receipt date

- P3)Upon receipt of Vendor's preliminary report via email, determine if Immediate or Priority features are present. Once identified, apply tool tolerance to Immediate features only; do not apply tool tolerance to non-HCA anomalies. If Immediate or Priority features are identified as defined by GPL-513 and CPL-AID Supplement A, use MPR 4104 to determine the required deration pressure for the line. Work with the District Engineer (SCD), Logistics and/or Technical Service Engineer, where applicable, to determine current MOP and operating conditions of the pipeline to aid in the determination of deration pressure:
 - a) Review requirements of MPR-4104 and if pressure deration calculations will take some time to perform, take a interim pressure deration as instructed in MPR-4104 otherwise:

b) For dent and crack categories:

Using the @web2 program and PI, determine the historical pressures at the closest monitoring points upstream and downstream of the features beginning from 60 days prior to when the ILI tool was removed from the trap to the present.

(1) Using the historic high pressure at the limiting monitoring point(s), set the deration pressure in accordance with MPR-4104.

(a) Note: It is up to the IE to work with the Control Center and Scheduling to determine which monitoring point(s) should be used as the limiting point.

(b) Note: Use "Sampled Data" with a 5 minute interval for the PI data retrieval.

(c) Note: The controlling pressure shall be based upon the pressures at the monitoring points which are taken at the same sampling time.

c) For metal loss features categories:

i) The deration pressure shall be in accordance with MPR-4104.

d) For any other features the tool vendor reports as injurious to the pipeline:

A suitable pressure reduction methodology will be used or developed in consultation with the Pipeline Integrity Manager.

Save copies of the pressure deration calculations as working copies in the appropriate pipeline folder on S:\Transportation\Tech_Ser\Internal Inspections

P4) Issue the Initial Pressure Deration email to the following distribution list: (See the appropriate organizational chart(s) for potential recipients)

- a) Senior Pipeline Controller Recipient, others are on the .cc list
- b) Manager of Engineer and Projects
- c) Pipeline Integrity Manager
- d) Pipeline Integrity Manager
- e) Technical Services Engineer
- f) Pipeline Division Manager
- g) Major Maintenance Supervisor
- h) Logistics Manager
- i) Scheduling Director
- j) Pipeline Scheduler
- k) Controller Center Manager
- I) Regulatory Compliance Manager
- m) DOT Coordinator
- n) DOT SRC Coordinator
- o) Supervisor Engineering Services
- p) Pipeline Integrity Analyst
- q) Integrity Engineer Lead
- r) Environmental Coordinator

Rev. 42 - Effective Date: 2009-04-15

This Initial Pressure Deration email shall be **released the same day as receipt** of the Preliminary Report email or shortly thereafter, so that the field crews can begin planning the repairs and evaluating for a Safety Related Condition (SRC). Address the SRC portion of the email to the Area Supervisor. This email becomes the Date of Discovery for these features. Save a copy of this email in *.msg format in the appropriate pipeline folder on S:\Transportation\Tech_Ser\Internal Inspection. See link below for standard email templates.

http://livelink.conocophillips.net/livelink.exe?func=ll&objld=48523956&objAction=browse&sort =name&viewType=1

- P5) Once the pressure deration email above has been issued, contact the Major Maintenance Supervisor by phone or leave voice message. Also contact the District Engineer, if required (SCD).
- P6) If the line cannot be derated and remain in service, follow the instructions in Section F36 through F39. Once you have completed performing the steps in Section F39, return and continue with step P(8).
- P7) Update the BAP with the Preliminary Derate Date. Include a note in the comments to indicate the number of Immediate and Priority repairs identified off of the preliminary report.
- P8)Develop the ILI Integrity Work List and associated dig sheets, if applicable (developed by hand from vendor's dig sheets) for Immediate and/or Priority Features. For crack-like anomalies, request from the tool vendor a listing of any other anomalies on the same joint for use as verification/correlation anomalies. Correlate vendor dig sheets to HCA location in order to assign the correct priority code (use the data in PnTUtility to determine the could-affect HCA list). For non-HCA anomalies, do NOT add tool tolerance when classifying the anomalies; only add tool tolerance to anomalies located in HCAs. Use the official manual template copy of the "ILI Integrity Worklist" (located at C:\Apps\Data\cplaid\HelpFiles\). Save the completed worklist in the appropriate pipeline inspection file on the S:\transportation\text{tech ser\Internal Inspections drive.}
- P9)Issue a transmittal of "Immediate/Priority Features Preliminary Report" approved by the Pipeline Integrity Manager. If no Immediate or Priority features are present, also issue transmittal as such, for documentation. Use the report template and Access Database located at S:\Transportation\tech_ser\Internal Inspections\0 Forms\Transmittal Templates to develop the Transmittal Report.
- P10) Move the following documents to the appropriate EDMS workspace:
 - **Note 1:** The following is a list of the documents associated with ILI inspections that should be stored in EDMS as part of the Preliminary Reporting. Working copies of all of these documents should be located in the applicable tool run file on
 - s:\\Transportation|tech_ser\Internal Inspections. The names below are intended to be standard naming conventions to be used within the EDMS file structure.
 - a) Set up new folder using the year of the ILI run and the type of ILI tool (ie 2006 MFL; 2006 Caliper, 2006 Combo, etc.) Into this folder, copy:
 - (1) Transmittal Letters
 - (2) ILI Integrity Worklist (if applicable)
 - (3) Dig Sheets (if applicable)
 - (4) Pressure deration emails (if applicable) (Store emails using Outlook Message Format (*.msg))
 - (5) Pressure deration calculations (if applicable)

Note 2: From time to time, single Transmittals may be made for multiple runs in the same segment (ie., MFL and Caliper tools run separately). In those cases, the EDMS location for the MFL run should contain the transmittal documents. The folder for the other technology, i.e. the caliper run, should contain shortcuts to link to the documents in the MFL run folder. The shortcuts should be named as follows:

Combined Transmittal Letters

Rev. 42 - Effective Date: 2009-04-15

Combined ILI Integrity Worklists Combined Dig Sheets

The existing folder names can remain unchanged.

Note 3: After the above files have been moved to EDMS, delete the working copies from the S:\ drive

P11)Use the standard email transmittal template located at <u>ILI Report Template</u> to transmit the report by email.

a) Distribute the Transmittal email with a link to the documents stored on the EDMS file location as follows:

i) Region Manager - Recipient, others are on the .cc list

ii) Major Maintenance Supervisor

(1) All subordinates down to and including the individuals responsible for making repairs.

iii) Regulatory Manager(as necessary)

- iv) DOT Coordinator (as necessary)(for California projects, include coordinator anytime that an ILI Worklist is issued so that the CSFM can be informed)
- v) DOT SRC Coordinator (If Immediate or Priority Features are on worklist)
- vi) Environmental Coordinator (If worklist is to be issued)

vii) Corrosion Control SME (If Worklist is issued)

viii) Corrosion Engineer of appropriate area (If Worklist is issued)

ix) Corrosion Team Leads of appropriate area(If worklist is to be issued)

x) Pipeline Integrity Analyst

b) Retain originals documents listed in P10)) above in PIR files

- P12) Issuance of the transmittal letter will be the trigger for the Integrity Engineer to do the following tasks from the documents placed in the IE folder or on EDMS for the applicable tool run:
 - a) Update BAP Database as follows:

) From the "BAP Segment Data Entry" Form:

(1) Review Baseline Assessment (BA) Completed Date field. If empty update with baseline assessment completion date.

(a) If BA consists of one ILI tool run, date is completion date of tool run.

- (b) If BA consists of more than one tool run, and time separation is less than 30 days, date is completion data of last tool run.
- (c) If BA consists of more than one tool run, and time separation is greater than 30 days, date is completion of first tool run.
- ii) From the "BAP Assessment Data Entry" Form:

(1) Run dates

(2) Preliminary report receipt date

(3) Preliminary transmittal date

(4) Preliminary pressure deration date, if applicable

P13)Add features to the Anomaly Counting Database (ACD) using the ACD Load procedure located in the back of this procedure.

P14)If Immediate and/or Priority features are identified and you have not done so already, contact the field Maintenance Supervisor and/or Pipeline Integrity Project Engineer to identify if the PLE group or the field maintenance group will be responsible for the repairs.

Note: If the PLE group will be responsible for the repairs, the Pipeline Integrity Project Engineer will write a work order to capture excavation and repair costs; otherwise the IE will:

- a) Request a repair cost estimate from the appropriate field personnel of that segment. If crack-like anomalies require evaluation, the field should include cost of non-destructive evaluation contractor as well as abrasive blasting pipe preparation.
- b) Using the procedures listed in Appendix 05H, prepare a Work Order for all repairs



c) Once released, communicate the SAP WO number for repairs and/or cutouts to the individual responsible for performing the work.

P15)Update hours worked developing worklist and transmittals in the SAP work order for the specific tool run.

Preliminary ILI Vendor Reports - Follow-up on Immediate and Priority Feature

- P16)Upon receipt from the field, the Pipeline Integrity Analyst (IA) loads the ILI worklist to S:\Transportation\tech-ser\Internal Inspections\0">ILI Worklist Review. The IE will review the worklist within one week after it is posted to the S:drive, following the steps outlined in the ILI Worklist Review Procedure in the back of this appendix.
- P17)Once a deration is in effect, the Integrity Analyst will monitor the length of time the deration has been in place. If the deration is still in effect after 60 days, the Integrity Analyst will monitor the Administrative Controls deadline as listed in **the Administrative Controls**Extension Procedure in the back of this appendix.
- P18) After written notification of completion of all Immediate and/or Priority repairs, issue rescinded deration email.
- P19)Update BAP with rescinded deration email date
- P20) Update EDMS with rescinded deration email.
- P21) Each time a worklist is returned with new completions, the IE will review it for compliance with API 1163 as outlined in **the API 1163 Compliance Review Procedure** located in the back of this appendix.

Official Document Location: EDMS TPL 520-LIF

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Upon Receipt of Final ILI Vendor Reports – Immediate and 60-Day Feature Selections

F1) If applicable, Fax vendor's Report Receipt Confirmation form back to the vendor with signature and date documenting receipt of final report.

F2) Document receipt date on the cover and first page of the report with the Integrity Engineer's initials and date.

F3) Update BAP Database with final report receipt date.

F4) Confirm that the Final Report is correct as follows

a)Check ILI odometer run length against map distance. If necessary, determine if odometer distance is within allowable tolerance. If odometer is out of tolerance, have a conversation with the tool vendor analyst to determine if there were any operational issues with the odometers. Continue with step F4 B); however, review the Reference Point graph produced during data upload to the CPL-AID program to determine if the discrepancy is linear. Use engineering judgment to determine if the amount of discrepancy will affect the ability to accurately locate anomalies based upon distance.

b)Check interaction rules used. If incorrect, contact vendor for new report.

c) Check pipe properties including location of marker plates.

- d) Confirm the final report includes Process Validation documentation. Review the document(s) for unresolved or previously unreported inconsistencies with the tool run. These may include system errors such as loss of sensors, odometer discrepancies, and other data capture issues. Contact the ILI tool vendor with any items that require further evaluation and/or resolution. If the inconsistencies cannot be resolved, the inspection results are not verified.
 - i) TDW Magpie Process Validation documentation includes:

(a) Tool Preparation Build Sheet

(b) Field Technician Run Report

(c) Run Results Report

(d) Incoming Run Data Quality Check

F5) Load from Vendor's CD the following files to the appropriate S:\Drive pipeline folder a)Inspection Report

b)Pipeline Listing Spreadsheet(s)

c)Access files as necessary

F6) Send email to Bryon Vassen that the final report is available on the S:\ Drive for loading into CPL-AID. In the email, log your user ID and the work order number in the appropriate locations. The invoice will be sent in as an ePayable SAP invoice, so not PO is required.

F7) Evaluate the Final report for Immediate and Priority Repair features as follows:

- a) MFL tools:
 - Top-sided dents with metal loss
 - (1) Vendor call regardless of HCA impact
 - ii) > 80% metal loss features
 - (1) Add tool tolerance to vendor-called depth
 - iii) Burst < MOP
 - (1) Calculate the burst pressures using each of the three pressure calculators. One method to do this is to:
 - (a) Take the anomaly with the lowest Rstreng value from the vendor supplied pipe list file. Using the effective Rstreng depth and Rstreng length, add tool tolerance and calculate the burst pressure
 - (b) Use the peak depth and length, add tool tolerance to each dimension and calculate the burst pressure using B31G modified equation
 - (c) Use the peak depth and length, add tool tolerance to each dimension and calculate the burst pressure using the B31G equation



Rev. 42 - Effective Date: 2009-04-15

- (2) If any one of the above calculated pressure values results in a burst pressure that is greater than the MOP of the feature at that location, the anomaly passes the analysis and is not an Immediate or Priority feature.
- (3) If the anomaly above does not pass at least one of the above pressure calculations, a full analysis of the anomalies for Immediate, Priority and 60 Day features must be performed using an appropriate pressure calculating spreadsheet located at http://livelink.conocophillips.net/livelink.exe/ILI Metal Loss Evaluation.xls?func= doc.Fetch&nodeId=48524177&docTitle=ILI+MetaI+Loss+Evaluation&viewType=
- b) Caliper tools:

i) Top-sided dents greater than 6%

(1) ONLY applies to areas that could affect HCAs

(2) Use vendor-called depth with the vendor tool tolerance added.

(3) Use Vendor orientation tolerance during anomaly selection (where tolerance information is available from vendor). Subtract the tolerance on the 3:00 o'clock side of the pipe and add the tolerance on the 9:00 o'clock side of the pipe.

c) Crack tools (Ultrasonic or Transverse Flux)

i) If depths are reported in ranges, then any anomalies that are in the top, unbounded depth band (example: "greater than 0.160 inch") if not already reported in Preliminary Report will be added to the ILI Worklist

ii) If depths are reported with specific percentage, then anomalies greater than 80% minus the tolerance of the tool (example: 80% - 20% depth tolerance = greater than 60%) if not already reported in Preliminary Report will be added to the ILI Worklist

iii)Cracks which have a calculated failure pressure below Maximum Operating Pressure

- (1) Enter tool run anomaly data into the Kiefner & Associates log secant equation spreadsheet http://livelink.conocophillips.net/livelink.exe?func=Il&objld=120235609&objAction =browse&sort=name&viewType=1. Use the KAPA2005.xls spreadsheet
- (2) Use Charpy impact energy (toughness) from previous Pressure Cycle Fatigue Analysis unless actual pipe test data is available

(3) If depths are reported in ranges, enter the depth in the spreadsheet as the deeper of the two values

(4) If depths are reported as a specific percentage, enter the sum of the reported depth plus tool depth tolerance

F8) If Immediate or Priority features are discovered:

- a) If Immediate or Priority features which were not discovered during the Preliminary Report review are identified, perform the following steps as soon as possible but no later then 5 days after receipt of the final report. If a final worklist and transmittal letter for all features in the ILI run can be developed and released in 5 days or less, the Immediate, Priority and 60 Day Features transmittal can be combined with the All Features transmittal. Any required pressure deration must be completed within the 5 day allowable window.
- b) Review requirements of MPR-4104 and if pressure deration calculations will take some time to perform, take a interim pressure deration as instructed in MPR-4104 otherwise:

i) For dents and crack categories:

(1) Using the @web2 program and PI, determine the historical pressures at the closest monitoring points upstream and downstream of the features beginning from 60 days prior to when the ILI tool was removed from the trap to the present.

(2) Using the historic high pressure at the limiting monitoring point(s), set the deration pressure in accordance with MPR-4104.

(a) Note; It is up to the IE to work with the Control Center and Scheduling to determine which monitoring point should be used as the limiting point.

Rev. 42 - Effective Date: 2009-04-15

- (b) Note: Use "Sampled Data" with a 5 minute interval for the PI data retrieval.
- (c) Note: The controlling pressure shall be based upon the pressures at the monitoring points which are taken at the same sampling time.

ii) For metal loss features categories:

(1) The deration pressure shall be in accordance with MPR-4104.

(2) Save copies of the pressure deration calculations as working copies in the appropriate pipeline folder on S:\Transportation\Tech_Ser\Internal Inspections

iii) For any other features the tool vendor reports as injurious to the pipeline:

- (1) A suitable pressure reduction methodology will be used or developed in consultation with the Pipeline Integrity Manager.
- c) Prepare Digs Sheets, (developed by hand) and email them to the individuals responsible for doing evaluations and repairs.
- d) Issue Final Pressure Deration email to the following distribution list, if applicable:
 - i) Senior Pipeline Controller Recipient, others are on the .cc list
 - ii) Manager of Engineer and Projects
 - iii) Pipeline Integrity Manager
 - iv) Pipeline Integrity Manager
 - v) Technical Services Engineer
 - vi) Pipeline Division Manager
 - vii) Major Maintenance Supervisor
 - viii) Logistics Manager
 - ix) Scheduling Director
 - x) Pipeline Scheduler
 - xi) Controller Center Manager
 - xii) Regulatory Compliance Manager
 - xiii) DOT Coordinator
 - xiv) DOT SRC Coordinator
 - xv) Supervisor Engineering Services
 - xvi) Pipeline Integrity Analyst
 - xvii)Integrity Engineer Lead
 - xviii)Environmental Coordinator
- e) Contact the Major Maintenance Supervisor by phone or leave voice message notifying him/her of the deration. Please address the Area Supervisor in the SRC portion of the duration email.
- f) If the line cannot be derated and remain in service, follow the instruction in Section F36 through F39. Once you have completed performing the steps in Section F39, return and continue with step F9.
- F9) Evaluate the Final report for 60-Day Repair features as follows:
 - a) MFL tools:
 - i) Top-sided dents
 - (1) ONLY applies to areas that could affect HCAs
 - (2) If caliper data is available, reduce the list of all MFL dent calls to those which are greater than 3% with the vendor tool tolerance added.
 - (3) If no caliper data is available, include all top-sided MFL dents calls in the ILI Integrity Worklist
 - (4) Use Vendor orientation tolerance during anomaly selection (where tolerance information is available from vendor). Subtract the tolerance on the 3:00 o'clock side of the pipe and add the tolerance on the 9:00 o'clock side of the pipe
 - ii) Bottom Side Dents with any indication of 1) metal loss, 2) cracking or 3) a stress riser
 - (1) Only applies to areas that could affect HCAs
 - (2) Use vendor-called depth with the vendor tool tolerance added.



(3) Use Vendor orientation tolerance during anomaly selection (where tolerance information is available from vendor). Subtract the tolerance on the 3:00 o'clock

b) Caliper tools:

i) Top-sided dents greater than 3%

(1) ONLY applies to areas that could affect HCAs

(2) Use vendor-called depth with the vendor tool tolerance added.

(3) Use Vendor orientation tolerance during anomaly selection (where tolerance information is available from vendor). Subtract the tolerance on the 3:00 o'clock side of the pipe and add the tolerance on the 9:00 o'clock side of the pipe.

side of the pipe and add the tolerance on the 9:00 o'clock side of the pipe

F10) Develop transmittal of Immediate/Priority/60-Day Feature Evaluation of Final Report approved by Pipeline Integrity Manager.

a) Store the following documents on the appropriate EDMS workspace and include a link to the EDMS file location in the transmittal email.

(1) Transmittal Letters (store on EDMS)

(2) ILI Integrity Worklist (if applicable, store on EDMS)

(3) Dig Sheets (as required, store on EDMS)

- b) Distribute the Transmittal email with the link to the documents stored on the EDMS file location as follows:
 - (1) Region Manager Recipient, others are on the .cc list

(2) Major Maintenance Supervisor

(a) All subordinates down to and including the individuals responsible for making repairs.

(3) District Engineer (California only)

(4) Regulatory Manager (as necessary)

- (5) DOT Coordinator (as necessary) (for California projects, include coordinator anytime that an iLI Worklist is issued so that the CSFM can be informed)
- (6) DOT SRC Coordinator (if Immediate or Priority features are included on worklist)

(7) Corrosion Control SME (If Worklist is issued)

(8) Corrosion Engineer of appropriate area (If Worklist is issued)

(9) Corrosion Team Leads (If Worklist is issued)

(10) Environmental Coordinator (If Worklist is issued)

(11)Pipeline Integrity Analyst

c) Retain originals documents listed in a) above in PIR files

F11) Issuance of the transmittal letter will be the trigger for the Integrity Engineer to do the following tasks:

a) Update BAP Database with:

i) Enter the Final Transmittal Immediate Date, if an Immediate, Priority and 60 day features transmittal has been completed.

ii) Enter the Final Immediate deration date, if applicable

iii) Add a note in the Analysis Comment field as to how many anomalies are being reported in the transmittal report and ILI Integrity Worklist.

b) Update EDMS with:

- (1) Pressure deration emails (if applicable)
- (2) Pressure deration calculations (if applicable)

(3) Transmittal Letters (if not previously done)

(4) ILI Integrity Worklist (if applicable and if not previously done)

(5) Dig Sheets (if applicable and if not previously done)

Note 1: From time to time, single Transmittals may be made for multiple runs in the same segment. In those cases, the EDMS location for the MFL run should contain the transmittal documents. The folder for the other technology, i.e. the caliper run, should contain shortcuts to link to the documents in the MFL run folder. The shortcuts should be named as follows:



Rev. 42 - Effective Date: 2009-04-15

Combined Transmittal Letters Combined ILI Integrity Worklists Combined Dig Sheets

The existing folder names can remain unchanged.

Note 2: After the above files have been moved to EDMS, delete them from the S:\ drive F12) Add features to the Anomaly Counting Database (ACD) using the ACD Load procedure

located in the back of this procedure.

F13) If Immediate, Priority and/or 60-day features are identified and you have not done so already, contact the field maintenance supervisor and/or Pipeline Integrity Project Engineer to identify if the PLE group or the field maintenance group will be responsible for the repairs.

Note: If the PLE group will be responsible for the repairs, the Pipeline Integrity Project Engineer will write a work order to capture excavation and repair costs; otherwise the IE

wiii:

- a)Using the procedures listed in Appendix 05H, prepare a cost estimate and work order for all repairs.
- b)Once released, communicate the SAP WO number for repairs and/or cutouts to the individual responsible for performing the work.
- F14) Update hours worked developing worklist and transmittals in the SAP work order for the specific tool run (not the repair work order).

Final ILI Vendor Reports - Follow-up on Immediate & 60-day features

F15)Upon receipt from the field, the Pipeline Integrity Analyst (PIA) loads the ILI worklist to S:\Transportation\tech ser\Internal Inspections\0 ILI Worklist Review. The IE will review the worklist within one week after it is posted to the S:drive, following the steps outlined in the ILI Worklist Review Procedure in the back of this appendix.

F16)Once a deration is in effect, the Integrity Analyst will monitor the length of time the deration has been in place. If the deration is still in effect after 60 days, the Integrity Analyst will monitor the Administrative Controls deadline as listed in the Administrative Controls

Extension Procedure in the back of this appendix.

F17) After written notification of completion of all Immediate and/or Priority repairs, issue rescinded deration email.

F18) Update BAP with rescinded deration email date

F19) Update EDMS with rescinded deration email.

F20) Each time a worklist is returned with new completions, the IE will review it for compliance with API 1163 as outlined in the API 1163 Compliance Review Procedure located in the back of this appendix.

Rev. 42 - Effective Date: 2009-04-15

Final ILI Vendor Reports - All Remaining Feature Selections

Note: If user is going to be using <u>Appendix 05Q CPL-AID Procedures Manual - Procedure 8 - Dig List Creation</u>, please proceed with the steps F21 through F24 below. However, if user is going to use <u>Appendix 05R Spreadsheet Analysis Procedure</u>, skip steps F21 to F24 and use the steps included in the Spreadsheet Analysis Procedure instead, then return to step F25 of this procedure and continue below.

If selecting anomalies from a crack tool final report, provide tool run electronic data and report to Hydro-test Engineer. Hydro-test Engineer or consultant will perform fatigue analysis of reported anomalies in accordance with TRP-3005 to determine if any additional anomalies require excavation prior to the desired re-inspection interval. If additional anomalies require excavation from this analysis, manually add them to dig list using Appendix 05Q CPL-AID Procedures Manual – Procedure 8 – Dig List Creation after proceeding with the steps F21 through F24 below.

- F21) If not previously sent, send Bryon Vassen an email that the final report has been loaded to the s:\ drive and is ready for him to load into CPL-AID. Include your user ID number and the work order number of the tool run for invoicing purposes.
- F22) Bryon Vassen will load HCA data into CPL-AID.
- F23) Please Note: Bryon Vassen currently loads the MOP point by point values if available. There must be at least one value in the tbIMOP in CPL-AID. It is preferred that the IE use the point by point MOP values and load tbIMOP with these values! Check for Point by Point MOP values on EDMS for the system being analyzed. If point by point values are not available, use the default value and load it into tbIMOP. CPL-AID does not currently minimize the pick list without at least one value in this table.
- F24) For MFL and Caliper tool runs, the IE is to use CPL-AID and select the remaining features (Using criteria below)
 - a) Use "Appendix 05Q CPL-AID Procedures Manual Procedure 8 Dig List Creation" to perform feature selections and to be exported from CPL-AID as an ILI Integrity Worklist and Log Data Dig Reports. Once finished with the above procedure, return here and complete the remaining procedural steps below.
 - b) For tool runs with less than six field verification results (combination of current run and historical correlation/verification features), the tool run will need to be verified by ILI Tool Vendor System Results Verification. Use standard language on the ILI Report Template to request this documentation from the ILI tool vendor. Upload these documents to the appropriate EDMS workspace.
- F25) For Crack Tools (Ultrasonic or Transverse Flux), the IE is to perform the following steps which provide data for Pressure Cycle Fatigue Analysis (PCFA).
 - a) Produce a copy of the Elliptical Crack Spreadsheet

 (http://livelink.conocophillips.net/livelink.exe?func=ll&objld=120235615&objAction=browse&sort=name&viewType=1) and notify Hydrostatic Test Engineer by email that the data and original vendor final report have been loaded to the S: drive for use in PCFA.
 - i) Follow directions on tab 1 in spreadsheet for loading CPL-AID data into appropriate named ranges within spreadsheet.
 - ii) Enter all crack anomaly data (reference Vendor Calls for Crack Detection Tools spreadsheet) into Elliptical Crack Burst Calculator spreadsheet.
 - iii) Use default of 25 ft-lb for Charpy impact energy (toughness).
 - iv) For Ultrasonic Tools (UT), enter the wall thickness as the measured wall thickness.



Rev. 42 - Effective Date: 2009-04-15

- v) For Transverse Flux (TFI) and Axial Flaw (AFD), enter the wall thickness as the nominal wall thickness.
- vi) For depths reported in ranges, enter the depth in the spreadsheet as the deepest part of the range.
- vii) For depths reported as a specific percentage, enter the depth as the sum of the reported depth and tool depth tolerance.
- viii) For lengths, consider the tool vendor's tolerance as a constant or percent depending on the feature's size.

F26) For Crack Tools, the IE is to add anomalies manually through CPL-AID to the ILI Integrity Worklist based on the Vendor Calls for Crack Detection Tools Spreadsheet.

- a) If crack anomaly depths are reported in ranges, then all anomalies that are in the top, unbounded depth band (example: "Greater than 0.16 in") if not already reported on the Preliminary Report, will be added to the ILI Worklist as Priority 2005A.
- b) If crack anomaly depths are reported with specific percentage, then anomalies with added tool tolerance greater than 80% if not already reported on the Preliminary Report, will be added to the ILI Worklist as Priority 2005B.
- c) Crack anomalies which have a calculated failure pressure below Maximum Operating Pressure (MOP) shall be added to the ILI Integrity Worklist as Priority 2005C.
- d) Gouges, grooves, and scratch (ie: Notch-like) feature anomalies with a depth greater than 12.5% with tool tolerance shall be added to the ILI Integrity Worklist as a iiil if inside an HCA or a 1205A if not within an HCA.
- e) Dent features shall be added to the ILI Integrity Worklist as Priority iiiB for bottom side and Priority iiA for top side if located inside an HCA and no deformation tool data exist. If data exist, then a correlation effort within CPL-AID is required and only new dents not in the comparison deformation tool data shall be added to the list. All non-HCA dents will not be added to the ILI Integrity Worklist.
- If pipe segment has had a hydro to 1.25 x MOP, then repair of laminations is not required. If not, then reference ASME B31.4 Paragraph 451.6.2.6 PROCESS. Flowchart to determine if laminations shall be added to the ILI Integrity Worklist as Priority 2100A.
- g) Metal Loss anomalies affecting seam or girth welds can not safely use the B31-g calculator and therefore shall be added to the ILI Integrity Worklist as iiiH and 1005E.
- h) SCC (ie: Crack-field) feature anomalies on pipeline segments that do not meet 2005A, 2005B, and 2005C criteria, shall be added to the ILI Integrity Worklist as Priority 2015A regardless of size, length and width until the Corrosion Group determines a method to further assess SCC.
- Tool Verification is achieved with a minimum of six (6) features that are excavated and evaluated. An attempt shall be made to identify six (6) external features should the IE not identify a minimum of six (6) features with the above criteria. These shall be added to the ILI Integrity Worklist as Priority 8000.
 - The initial choice of anomalies to excavate should include the deepest listed external anomaly along with all other anomalies identified on the same pipe joint.
 - 2) The second choice of anomalies to excavate should include external anomalies that are closest to the outlet of a pump station.
- Upon completion of the PCFA, the reassessment interval for the crack tool shall be determined and all crack anomalies with a shorter safe life shall be added to the ILI Integrity Worklist as Priority 8200 unless the feature is used for the tool verification above.

Rev. 42 - Effective Date: 2009-04-15

NOTE: If Appendix O5R Spreadsheet Analysis Procedure was used above, return to Step F25 and continue by completing the remaining procedural steps below:

F27) For crack tools, the IE is to perform the following steps which provide data for Pressure Cycle Fatigue Analysis (PCFA).

a) Using CPL-AID, produce a copy of the Log Features All Joints report and export to the

appropriate S: drive folder.

Notify the Hydrostatic Test Integrity Engineer by email that the Log Features
Report and the original vendor final report have been loaded to the S: drive for use in PCFA

F28) For crack tools, any crack with a calculated SOP less than MOP (SOP<MOP) shall be

added to the ILI Integrity Worklist.

a) Use the Kiefner & Associates log secant equation spreadsheet (KAPA2005.xls spreadsheet) located on the EDMS site, load the crack features and calculate the safe operating pressure for each crack feature.

(1) Use Charpy impact energy (toughness) from previous Pressure Cycle Fatigue

Analysis unless actual pipe test data is available

(2) If depths are reported in ranges, enter the depth in the spreadsheet as the deeper of the two values

(3) If depths are reported as a specific percentage, enter the sum of the reported depth plus tool depth tolerance

(4) If depths are reported as a specific percentage, enter the sum of the reported

depth plus tool depth tolerance

- b) Any crack feature which has a Safe Operating Pressure (SOP) less than the Maximum Operating Pressure (MOP) shall be added to the ILI worklist using a priority code of "2005".
- c) Upon completion of the PCFA, the Hydrostatic Test Integrity Engineer will provide a listing of all crack features which require excavation and evaluation. All of the features identified by the Hydrostatic Test IE will be added to the ILI Integrity Worklist with an anomaly code of 8200.
- d) If no features are identified by either the static crack calculations listed this step or with Pressure Cycle Fatigue Analysis, identify a group of anomalies to excavate for verification of the tool run. An attempt should be made to identify six (6) features for excavation and evaluation.
 - The initial choice of anomalies to excavate should include the deepest listed anomaly along with all other anomalies identified on that pipe joint
 - ii) The second choice of anomalies to excavate should include anomalies that are closest to the outlet of a pump station
 - iii) Should no features be identified using the two items above, attempt to identify acceptable anomalies using the following:
 - (1) A minimum of 2 digs with the longest and deepest features. Since excavation of the entire joint is required, all anomalies listed on the joints identified should be added to the ILI Integrity Worklist
- F29) Issue transmittal letter documenting receipt of Final Report and actions to be taken, approved by Pipeline Integrity Manager with a link to the following EDMS-stored attachments:
 - a) Dig Sheets (if applicable)

b) ILI Integrity Worklist (if applicable)

F30)Distribute the Transmittal email with the link to the documents stored on the EDMS file location as follows:

Rev. 42 - Effective Date: 2009-04-15

- a) Region Manager Recipient, others are on the .cc list
- b) Major Maintenance Supervisor
 - i) All subordinates down to and including the individuals responsible for making repairs.

c) Regulatory Manager (as necessary)

- d) DOT Coordinator (as necessary) (for California projects, include coordinator anytime that an ILI Worklist is issued so that the CSFM can be informed)
- e) Corrosion Team Leads (If Worklist is issued)
- f) Environmental Coordinator (If Worklist is issued)

g) Pipeline Integrity Analyst

- F31) Issuance of the transmittal letter will be the trigger for the Pipeline Integrity Engineer to do the following tasks from the documents placed in the IE's folder for the applicable tool run on the S: drive:
 - a) Update BAP Database with:
 - i) Assessment Table and Segment Table if the run completes a Baseline Assessment
 - ii) Final Report receipt date
 - iii) Final remaining features transmittal date
 - iv) Statement in comment field about number to digs in the repair program
 - b) Update EDMS with:
 - i) Corrosion Items
 - (1) Internal Corrosion Histogram
 - (2) External Corrosion Histogram
 - (3) Casing Report
 - (4) Corrosion near pipeline crossings (ivF2 report)
 - ii) Dig Sheets from CPL-AID (if applicable, previously stored on EDMS)
 - iii) GPS Waypoint Files
 - iv) ILI Integrity Worklists (if applicable, previously stored on EDMS)
 - v) Pressure deration calculations (if applicable)
 - vi) Pressure deration emails (if applicable)
 - vii) Tool run validation emails from vendors (if applicable)
 - viii) Anomaly Due Date Extension Emails (if applicable)
 - ix) Transmittal Letters
 - x) Administrative Controls Extension emails (if applicable)
 - xi) Reference Points Validation Spreadsheet
 - xii) Anomaly Due Date Extension emails (if applicable)
 - xiii) RIA Economical Analysis
 - xiv) Dig Verification Program
 - c) File the following original documents in appropriate PIR file folder and put in box by Analyst's Desk, along with tool run final reports, to go to basement filling system
 - i) Signed Transmittal Letters (Preliminary Immediate, Final Immediate, and Final All)
 - ii) ILI Integrity Worklist (Preliminary Immediate, Final Immediate, and Final All) (if applicable),

Note 1: From time to time, single Transmittals may be made for multiple runs in the same segment. In those cases, the EDMS location for the MFL run should contain the transmittal documents. The folder for the other technology, i.e. the caliper run, should contain shortcuts to link to the documents in the MFL run folder. The shortcuts should be named as follows:

Combined Transmittal Letters

Combined ILI Integrity Worklists

Combined Dig Sheets

The existing folder names can remain unchanged.

Note 2: After the above files have been moved to EDMS, delete from the s:\ drive



F30) Add features to the Anomaly Counting Database (ACD) using the ACD Load Procedure located in the back of this procedure.

F31) If anomaly features are identified and you have not done so already, contact the field maintenance supervisor and/or Pipeline Integrity Project Engineer to identify if the PLE group or the field maintenance group will be responsible for the repairs.

Note: If the PLE group will be responsible for the repairs, the Pipeline Integrity Project Engineer will write a work order to capture excavation and repair costs; otherwise the IE

a) Using the procedures listed in Appendix 05H, prepare a cost estimate and work order for all repairs.

b) Once released, communicate the SAP WO number for repairs and/or cutouts to the individual responsible for performing the work.

F32) After completion and release of the Final Report Transmittal, the IE shall:

a) Update the AP History document to reflect the tool run in Section 5.2 ILI Tool Runs

b) Update the AP History document to reflect the tool run date in Section 10 Baseline Assessment or Section 11 Reassessment Sections as appropriate

c) Send an email to the Integrity Management and Risk Assessment Engineer to add the next reassessment to the AP History Document.

F33) Update SAP with hours worked in work order that original tool run was perform under.

Final Reports - Follow-up on Remaining Repairs

- F34) Once a deration is in effect, the Integrity Analyst will monitor the length of time the deration has been in place. If the deration is still in effect after 60 days, the Integrity Analyst will monitor the Administrative Controls deadline as listed in the Administrative Controls Extension Procedure in the back of this appendix.
- F35) If required repairs cannot be completed by the scheduled due date, perform the following tasks:

a) Non-HCA areas

Contact the Field Maintenance Supervisor and request email documentation of why the repairs cannot be completed on time and when the repairs can be realistically expected to be completed.

ii) Forward the received email, with a request to extend the due date(s), to the Pipeline Integrity Manager for approval.

iii) Upon approval, changes may be required in the ACD.

- (1) If the anomaly is a Priority indication, do not change the original due date in the worklist on EDMS; however, change the due date to the new date in the ACD.
- (2) If the anomaly is not a Priority feature change the required completion date(s) in the Integrity Worklist to the new due date(s), and load the updated list into
- iv) Post the extension approval letter in EDMS under the Anomaly Due Date Extension
- v) The IE will send an email transmittal and link to the revised work list to the individual responsible for making repairs. Copy the Integrity Analyst on this transmittal email.

b) HCA areas

- i) Anomalies that are not evaluated/repaired prior to the required due date, will require □uration of the pipeline if they are within an HCA.
- ii) Upon notification that repairs will exceed the required due date, perform [uration calculations as outlined in MPR 4104, section 5. Use the "B31.4 451.7 Deration Calculator Single" located at s:\Transportation\tech_ser\Internal Inspections\0 Calculators.
- iii) Issue Past Due Repair Pressure Deration email to the following distribution list.
 - (1) Senior Pipeline Controller Recipient, others are on the .cc list
 - (2) Manager of Engineer and Projects



- (3) Pipeline Integrity Manager
- (4) Pipeline Integrity Manager
- (5) Technical Services Engineer
- (6) Pipeline Division Manager
- (7) Major Maintenance Supervisor
- (8) Logistics Manager
- (9) Scheduling Director
- (10)Pipeline Scheduler
- (11)Controller Center Manager
- (12)Regulatory Compliance Manager
- (13)DOT Coordinator
- (14)DOT SRC Coordinator
- (15) Supervisor Engineering Services
- (16)Pipeline Integrity Analyst
- (17)Integrity Engineer Lead
- (18)Environmental Coordinator
- iv) Update the BAP with the Past Due Derate Date. Add a comment identifying the Uuration pressure and your initials in the Analysis Comments field.
- v) Update EDMS with the pressure deration email.
- vi) Update EDMS with the pressure deration calculations.
- F36) If the line cannot be derated or operated under a pressure deration on the line, notification to PHMSA must be made and further controls must be implemented to ensure public safety and environmental protection. The IE is to email (include an automatic reminder that a response is required back to the initiator within 24 hours of the email) Manager of Pipeline Integrity, Manager of Asset Integrity, and Manager of Regulatory Compliance of the PHMSA notification requirement. The Manager of Asset Integrity must submit a notification to PHMSA based upon information gathered in the following step.
- F37) Complete the required information for the PHMSA notification form. An editable copy of the form is located at:

PHMSA Notification Form

- F38) Upon submission of the information to the PHMSA website, post a copy of the submission to EDMS under the appropriate line ID.
- F39) Upon notification of status from PHMSA, post a copy to EDMS under the appropriate line ID.
- F40) Upon completion of all Immediate, Priority and/or overdue repairs, issue rescinded Duration email.
 - a) Update BAP for date of rescinded □uration
 - b) Update EDMS with rescinded pressure urration email.
- F41) Upon Completion of project, close ILI WO.
- F42) Upon receipt from the field, the Pipeline Integrity Analyst (PIA) loads the ILI worklist to S:\Transportation\tech_ser\Internal Inspections\0 ILI Worklist Review. The IE will review the worklist within one week after it is posted to the S:drive, following the steps outlined in the ILI Worklist Review Procedure in the back of this appendix.
- F43) Each time a worklist is returned with new completions, the IE will review it for compliance with API 1163 as outlined in the **API 1163 Compliance Review Procedure** located near the bottom of this procedure.

Rev. 42 - Effective Date: 2009-04-15

ACD Load Procedure

A1) Review and confirm the System, Section and Run ID in CPL-AID. If not already setup, see CPL-AID Procedure 1.0 – Initial Setup of a New Pipeline Segment in CPL-AID.

A2) Using the "Anomaly Import Query - From CPL-AID V5_5 ILI Worklist Export" query, search for any anomalies which were input after the Preliminary Report Worklist Development. If anomalies are found, confirm that those anomalies are on the current final worklist and after loading the new worklist to the ACD, delete these duplicate entries.

A3)To load the anomalies in the ACD, do the following:

- a) Temporarily change Immediate Due Dates to match the Discovery Date in the ILI Integrity Worklist exported from CPL-AID, if applicable.
- b) Temporarily change Priority Due Dates to one year from the Discovery Dates in the ILI Integrity Worklist exported from CPL-AID, if applicable.

c) Temporarily change the engineering station format to remove the "+" sign by setting the appropriate column format as numbers, if applicable.

d) Check the far right columns of the ILI Integrity Worksheet to ensure that the worklist has the Section ID and Run ID fields completed. If the worklist was exported from CPL-AID, these two columns should be populated. If the worklist was generated manually, determine the Section ID and Run ID from the appropriate tables in CPL-AID and add the Run ID and Section ID to the ILI Integrity Worklist.

A4)Load the anomaly features information to the Anomaly Counting Database (ACD).

A5) Copy and paste all of the anomalies from the ILI Integrity Worklist including the Run ID and Section ID added above and after completing the temporary modifications above to the worklist, into the "Anomaly Import Query - From CPL-AID V5_5 ILI Worklist Export" query of the Anomaly Counting Database (ACD).

A6) Before leaving the ACD, make sure that there are no duplicate entries for any given anomaly.

ILI Worklist Review Procedure

- B1) Upon receipt of a worklist with completed excavations, the PIR Analyst uploads the worklist to the S:\Transportation\tech_ser\Internal Inspections\0 ILI Worklist Review folder. The IE will be responsible for review of the list, loading to EDMS and forwarding the approved worklist back to the Maintenance Supervisor. The IE is also responsible for updating the ACD with all dig completion details. In addition, the IE forwards the worklist to the tool vendor's Sr. Data Analyst.
 - Repeat this process on a weekly basis until the field evaluation is completed for all Immediate, Priority and 60 Day features. (A final copy of the worklist will be forwarded to the tool vendor upon completion of the dig program as part of the System Results Verification Process. (Process to be developed))

B2)Open the Excel file. On the Worklist tab, check Actual Field Evaluation and Repair Information columns (columns T through AE) for completeness and accuracy.

- i) Verify Field Determined Priority Code (column AC) is consistent with other reported
- ii) Verify data has been entered correctly, e.g., Metal Loss Actual Depth (%) (Column W) should be entered as a percent; Dent Actual Depth (inches) (Column X) should be entered in inches.
- iii) Verify that all required fields have been entered. If not, return the worklist to the field and notify them that the data is required prior to updating of the worklist.
- iv) Verify cell formats are correct as stated in the comment fields in row one.

Rev. 42 - Effective Date: 2009-04-15

v) Make changes as required.

B3)Upload the reviewed list to the ACD using the above procedure.

B4)Return the due dates and engineering stationing fields to the original formats.

B5) Upload the completed ILI worklist as a new version on the appropriate EDMS site.

B6) Email an EDMS link of the updated work list to the appropriate field personnel.

B7) Then, using the email template called Vendor Review, email the worklist, unity graph(s), and Summary Report from the ACD to the vendor.

B8) Place email sent and any responses from the vendor in the Dig Verification Program folder.

Administrative Controls Extensions

For Administrative Controls Extensions, See Appendix 05T Anomaly Evaluations and Deration Tracking Procedures.

API 1163 Compliance Review

For API 1163 Compliance Review Procedures, See Appendix 05N Dig Program Verification Procedures.

Field Procedures for updating the ILI Integrity Worklist

For future updates to the ILI Worklists please follow the steps below. If you have any questions please contact Betty Hendricks at 580/767-7450 or email to:

Betty.J.Hendricks@conocophillips.com.

Thanks for your help in keeping our data consistent for quicker processing time.

For reference we use the following process when updates come in. Betty Hendricks receives the updated worklist and double checks the "Date of Revision" with the date in EDMS making sure the most recent version was used to make updates. She will then send the worklist to a folder where the ILI Engineer will review making sure you have entered the correct data. If corrections need to be made they will return the worklist to the person responsible and ask them fix. Once the worklist has been corrected they will update EDMS and enter changes into the Anomaly Counting Database (ACD).

Steps:

- 1. Field downloads the most recent worklist from EDMS and updates "Actual Field Evaluation and Repair Information." If you cannot get into EDMS contact Betty Hendricks.
- When editing the worklist make all your changes in a Red Font.

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Rev. 42 - Effective Date: 2009-04-15

A few things to remember when entering data:

The following fields are numeric fields and ONLY numbers should be input, (do NOT include % or " in any of these fields):

- Actual Wall Thickness
- Metal Loss Actual Depth (%), (Input as a decimal number, i.e., 0.25 will be displayed as 25%).
- Dent Actual Depth (inches)
- Length (inches)

If a field of data does not apply to the anomaly you are recording, (such as Metal Loss Depth (%) for a plain dent), just leave the cell blank. Do not put in "0" or "n/a".

The cells are formatted to automatically wrap text. Please do not insert spaces to get information displayed on the next line.

Please keep in mind that the same anomaly may have a different Priority Code depending on whether it affects an HCA or not.

1. Once the ILI Engineer updates from this end they will change back to a **Black Font** and highlights the entire row in Yellow (indicating anomaly is complete) Example below.



Note:

The Integrity Engineer may make changes to the data that you submit so that the data format is correct and that the Field Priority Codes are correct. For this reason, it is important that you use the most current Worklist in EDMS when submitting future revisions. The Integrity Engineer will send an email to you letting you know that EDMS has been updated and if any you need to make any revisions to the data what was submitted.

1. DO NOT change the "Date of last revision" the top of the worklist. We will do this when we update your worklist in EDMS.

If you are unsure about how to create a PMLR number please see attached "how to."

http://livelink.conocophillips.net/livelink.exe/MPR_%2D_2809_%2D_Instructions_for_Completing_Form_3933_%2D_Pipeline_Maintenance_and_Leak_Report_%2 BPMLR%29.doc%unc=doc.Fetch&nodeld=34362255&docTitle=MPR+%2D+2809+%2D+Instructions+for+Completing+Form+3933+%2D+Pipeline+Mainten ance+and+Leak+Report+%28PMLR%29&viewType=1



PMLR #s.doc (90 B)

Also attached is a copy of the Priority Codes (GPL-513) when determining "Field Determined Priority Codes."

http://livelink.conccophillips.net/livelink.exe/GPL_513_%2D_PI_Form_%2D_Inline_Inspection_Analysis_Checklist_xls?func=doc.Fetch&nodeId=36529832&docTit le=GPL+513+%2D+PI+Form+%2D+Inline+Inspection+Analysis+Checklist+&viewType=1



Inline_Inspection_A nalysis_Che...

No.	Date	Initials	Description				
		DMW	Added more description on how to load features into the Anomaly Counting Database after the Preliminary and Final Immediate transmittals.				
1.0	07/12/2005 DMS		Added more description to some of the preliminary and final step to clarify if there are applicable or not when immediate features were not present in the preliminary or final reports.				
1.1	07/22/2005	DMS	Added a few more clarifications to EDMS documents and fold in the final report section.				
1.2	09/12/2005	DMW	Revised several sections to address the email distribution of transmittal letters and other documents.				
1.3 09/12/2005 DMW			Revised procedures to cross check CPL-AID Dig Lists with the Checklist and the Worklists. Revised Anomaly Counting Database loading procedure to match CPL-AID export changes.				
1.4	.4 09/13/2005 DMW		Removed Integrity Analyst from email distributions and changed distribution of Integrity Projects Director, Regulatory Director, and DOT Coordinator to as necessary rather than only if there are features to be addressed.				
1.5	09/14/2005	DMW	Added steps to the Preliminary Report and Final Immediate sections to remind the Integrity Engineer to release the SAP W for repairs, if needed				
1.6	09/14/2005	DMW	Added steps to Final Report Immediate/60-Day Evaluation on applying tool tolerance to features that could affect HCAs. Added 60-Day evaluation criteria.				
1.7	09/26/2005	DMW	Added comment to include DOT Coordinator on all transmittals that include an ILI worklist so that the CSFM can be informed.				
1.8	09/27/2005 DMW		Removed requirement to indicate Immediate Due Dates as Jan 1 st of the current year when putting features into the Anomaly Counting Database.				
1.9	11/02/2005	DMW	Added tolerance requirements to Step F8.				
1.10	11/03/2005	DMW	Added Pipeline Integrity Analyst to email distributions only if ILI Integrity Worklists are issued				
1.11	11/20/2005	DMW	Revised distributions to include everyone from the District Directors down to the person responsible for making the repairs.				
1.12	12/04/2005	DMW	Moved Step F39 about updating SAP with hours worked to co after making the Repair Estimate step.				
1.13	12/22/2005	DMW	Revised Final Transmittal section regarding issuing of dig sheets rather than Inspection Notebooks. Removed requirements to pur certain jewelry items into SAP as notifications				
1.14 1/10/06 DMS		DMS	Move steps F27 and F28 to New procedure "CPL-AID Modified Procedure" and renumbered this document. Also changed all references in this document, from "CPPL-AID" to CPL-AID" as the database name has recently been changed back to its original				

			name.
1.15	01/17/2006	DMW	Revised ACD loading steps to change Immediate to Discovery Date and Priority to 1 year after the Discovery Date.
1.16	02/01/2006	DMW	Revised process to include Corrosion Control Team Leads to all Final Transmittal Reports and removed Corrosion Director and Corrosion Specialist from the distribution.
1.17	02/03/2006	DMW	02/03/2006Removed requirement to update EDMS with MOP Determination Spreadsheets, OD Sheets and HCA data.
2	02/03/2006	DMS	Rev 2. Remove the following statement from step P1, as it is understood (If no Immediate or Priority features are present, also issue email of notification as such, for documentation.) and does not need to be stated. Added checklists to document and modified title into the header strip.
3	02/15/2005	DMS	Rev 3. Revised page format by added headers and footers. Added notes in red below Final Report – All Remaining Feature Selections. Changed some of the section headers. Removed requirements for emails on Areas of Suspect Cathodic Protection and requirements to create and issue histograms. Changed all references from CPPL-AID to CPL-AID. Changed all references from Control Points to Reference Points.
4	02/22/2006	DMS	Rev 4. Revised distribution to include Pipeline Integrity Analyst on all distributions. Re-organized procedure to segregate responsibilities of Pipeline Integrity Analyst. Revised procedure to make the Pipeline Projects Integrity Engineer responsible for preparing the repair estimates. Added Step F10 to send vendor corrosion histograms to Corrosion Control Group. DMW. Corrected numbering some of the items, corrected the checklist to make changes above, and modified wording of items # F28. Also correct the date and revision of this report
5	03/24/2006	DMS	Rev 5.Removed Corrosion Engineer and the Corrosion Technician from the Preliminary Report distribution. Removed the "(Only if ILI Worklist is included)" from the distribution of Transmittals for the Integrity Analyst. Added Step F25 to remind IE to send Corrosion Histograms for MFL tools if it wasn't previously done in the Immediate/60-Day Transmittal.
6	05/09/2006	DMW	Rev 6. Modified distribution lists to add Corrosion Leads to any distribution that contains a Worklist.
7	05/12/2006	DMW	Rev 7. Modified Step F25 to send Corrosion Histograms for all MFL assessments to the Corrosion Leads.
8	07/12/2006	DMS	Rev 8. Revised step P3 to say District Engineer (SCD) instead of Operations Services Supervisor. Also under step P3, add link for email transmittal templates. Revised step P5 and added second sentence about the District Engineer (SCD) and the Technical Service Engineer participation in MOP and pressure Curation determination, where applicable. Revised step P7 by adding the location information for the ILI Integrity Worklist template. Step P9 was changed to an Integrity Engineer's

			requirement and no longer the Analyst requirement. Step P9b was revised by adding notes 1 and 2 and modifying note 3. Step P9C was almost completely revised to include System, Section, and Run IDs setup in CPL-AID and Anomaly Counting Database (ACD) before added features to the ACD. Steps P10 and P11 were changed to Integrity Project Engineer's requirement instead of Integrity Engineer's requirement. Step F4b was revised. Step F7b (i) was revised to include Vendor's Orientation Tolerance. Step F9b was revised to include use vendor orientation tolerance. Step F11 was revised by adding requirement for notes on # features being report as well as revisions to me it read better and more specific. F11b was revised by adding notes 1 and 2 and modifying note 3. Steps F11 and F12 were changed to Integrity Project Engineer's requirement instead of Integrity Engineer's requirement. Step F21 as added to obtain GPS Lat, Lat and Elevation data from mapping group to be loaded into CPL-AID. Step F23 was revised to better describe the issuing of histograms. Step F24 was revised to exclude Appx 05P CPPL-AID Analysis Procedure as that procedure is not being used. When Appx 05P is reinstated as an active procedure it will again be added back into this procedure. F11b was revised by adding notes 1 and 2 and modifying note 3. Also revised F11b to include all of the EDMS File Naming Convention Documents listed in that document. The Checklist we removed from this document, as it was no longer current. The document owner was changed to Kelly Lee.
9	7/14/2006	DMS	Rev-9 Steps F21 and F22 including exports of Master Joint and Sublog to Terry Moore to obtain GPS data for CPL-AID and obtaining Landowner track numbers have been removed from this procedure and included in the Appendix 05Q – CPL-AID Modified Analysis Procedure.
10	7/25/06	KAL	Rev – 10. Clarified sequence of steps in Preliminary and Final Immediate pressure □uration and transmittal emails. Steps P3 and F8 – Clarified immediate derate pressures with respect to data sources. – Step P8 – Added reference to HCA database for determining Immediate versus Priority features. Step P7, F10 and F24 – Added Project Integrity Engineer to all transmittals. Step P10 – Clarified BAP data entry process. Step F25 – Added "Tool run validation emails from vendors" and "Administrative Controls Extension emails" to EDMS stored information. Step F26 – Clarified original documentation files for records and clarified entries into Anomaly Counting Database (ACD). Steps P11, P12, F12, F13, F27 and F28 – Changed to Notes: since work is performed outside the of this document.
11	8/3/06	KAL	Rev 11. Renamed Appendix 05Q to reflect new title and scope of 05Q document. New Appendix is "05Q CPL-AID Procedures Manual – Procedure 7 – Dig List Creations"
12	9/11/06	KAL	Rev 12. Removed reference to loading System ID, Section ID and Run ID to Anomaly Counting Database. Minor format changes
13	11/21/06	KAL	Rev 13 Added Bottom side dents with 1) metal loss, 2) crack or 3) stress riser to section F9 (b) as these are 60 day features.

14	12/4/06 KAL		Changed transmittal letters to an email with appropriate links to final documents stored on EDMS.			
15	1/19/07	KAL	Minor updates of distribution lists to include Pipeline Financial Analyst. Added instructions on pipeline repair date extensions and past due repair derations beginning at step F25			
16	2/5/07	KAL	Remove development of corrosion histograms from 05M procedure. New procedures exist in CPL-AID for this work. Removed procedures for setup of System, Section and Run ID. New procedures exist in CPL-AID for this work. Modified procedure for adding anomalies to Anomaly Counting Database.			
17	4/12/07	KAL	Added information on writing work orders to cover excavations and repairs. Added information on steps to take to document extension of time to perform repairs and required PHMSA notifications.			
18	5/14/07	KAL	Renumbered steps for consistency. Removed requirement for checklist on transmittal letters.			
19	6/29/07	KAL	Changed PHMSA notification form to Live link editable form. Added section ACD Load. Added crack tool references. Rewrite of sections to reduce redundancy.			
20	2/28/08	KAL	Minor cleanup of verbiage. Changed link for spreadsheet process from S: drive to EDMS link. Added ILI Worklist review and RIA documentation requirements. Added AP History update process.			
21	3/10/08	KAL	Added Administrative Controls Extension Procedure details. Moved routine tasks to minor procedure area attend of document. Removed MOP Determination Spreadsheets, OD Sheets and mechanical Data Sheets from file to load to EDMS. Mechanical Data Sheet load requirement sent to Terry Red Leaf to inclusion in Appendix 05A. Cleaned up formatting.			
22	3/25/08	KAL	Added crack tool anomalies for excavation and evaluation.			
23	3/27/08	KAL	Added Environmental Coordinators to the cc: list for all transmittals that include an ILI Integrity Worklist.			
24	4/15/08	KAL	Added Pipeline Controller Shift Superintendent and Supervisor Engineering Services to derate emails. Clarified storage areas on EDMS for Corrosion Items.			
25	4/16/2008	MRN	F29 c) iii – Removed this requirement to print dig sheets for basement filing system.			
26	5/8/08	DMS	Added cover page header and revised footers. Also put the revision log in a table.			
27	5/13/08	DMS	Updated Text of API 1163 Compliance Review Procedure to be consistence with today's requirements.			
28	Relocated Administrative Controls Extensions from this do to Appendix 05T Anomaly Evaluations and Deration Track Procedures.					

29	5/20/08 DMS		Relocated API 1163 Compliance Procedure to Appendix 05N Dig Program Verification Procedure.			
30	5/27/2008	ВЈН	Added Field Procedure for Updating the ILI Integrity Worklist			
31	10/3/2008	MRN	F7 c) iii) (1) Corrected the link for Crack calculator.			
32	10/3/2008	MRN	F37 Updated the PHMSA link with the correct URL.			
33	10/6/2008	MRN	Replaced F25 & F26 with new procedures for evaluating crack tools.			
34	10/6/2008	MRN	P11 & F30 – Added corrosion engineers to distribution list			
35	10/27/2008	MRN	P14 – Change responsibility of developing cost estimates from to field personnel.			
36	12/11/2008	MRN	P8 – Added a statement that tool tolerance is only applied to anomalies <u>not</u> located in HCAs.			
37	3/18/2008	MRN	B6 & B8 – Added two new steps for emailing updates to field personnel and unity graphs, etc to the vendor.			
38	3/18/2009	MRN	F36 – Added distribution list for PHMSA notification.			
39	3/18/2009	MRN	F31b- Added Dig Verification Category.			
40	4/14/2009	MRN	P4, F8, F35 – Updated distribution list due to re-organization			
41	4/15/2009	MRN	F36 – Added statement about automatic reminder within 24 hours P4 & F8e – Added statement about Area Supervisor being a recipient of SRC portion of duration emails.			
F30, F30c) d), F3 business titles pe Director and Inte		MRN	P3, P5, P9, P11ii, P11iii, P11iv, F8e, F10), F10b (3) (4) (7), F29, F30, F30c) d), F35)ii) — Updated these section with correct business titles per the organization chart. Integrity Projects Director and Integrity Projects Engineer were deleted as recipients of any transmittals.			